

PERMIT EFFICIENCY IMPLEMENTATION PLAN
Virginia Pollution Discharge Elimination System (VPDES)

Opp#	Opportunity	Task	TASK DESCRIPTION	Target Completion Date	LEAD (Team)	ACTIONS	Implementation Status
1	Electronic submittals for DMRs and supplemental information	1	Definition of scope and design		Purcell, Chambers		complete
		2	Construction		Purcell, Chambers		complete
		3	Testing, including identification of volunteer facilities to pilot	4/1/2006	Purcell (Tragesser, Choi)	Pilot testing completed in early February. A full round of testing started on March 1 and scheduled to be completed by March 28.	complete
		4	Stakeholder outreach and training	6/1/2006	Purcell (Tragesser, Choi)	have scheduled training for DEQ staff; need to work on schedule for permittees; have been giving talks to professional groups and have FAQs on DEQ website; can apply online to participate	on track
		5	Redefine recordkeeping and document control procedures to accommodate electronic submissions	6/30/2006	Purcell (Tragesser, Choi)		on track
		6	Transfer documents from hard-copy to electronic format	4/1/2006	Purcell (Tragesser, Choi, OIS)	data transfer scheduled for March 10th	on track
		7	Identify types of supplemental information permit holders are asked to submit, evaluate DEQ's need for that information, and evaluate additional electronic submission	11/30/2006	Purcell (Tragesser, Choi)		on track
		8	Identify grant opportunities or other mechanisms to assist small facilities with program phase-in	9/1/2006	Purcell, Choi		on track
		9	Full implementation of eDMR project	5/1/2006	Purcell	planning full rollout for April 10th	on track
		10	Evaluate extension to electronic submission of VPDES applications	3/1/2007	Winter (Tragesser, LaFleur)		on track
2	Change DMR submission date	1	Check EPA's schedule for submission/uploading of monitoring data. Evaluate whether CWA or grant govern submission schedule.	3/30/2006	Purcell (Choi, Linker)	EPA submission date for uploading is firm and also related to other uploaded items	complete
		2	If possible under federal rules, determine if state regulations need to be changed and initiate any changes needed	3/30/2006	Purcell (Choi, Linker)	Submission date flexibility can be achieved without changes to regulation	complete
		3	Determine if DMR submittal dates contained in VPDES permits can be changed without modifying permits	3/30/2006	Purcell (Choi, Linker)	Will do change administratively via letter from Rick Weeks to affected facilities indicating new eDMR due date is 15th of the month	complete
		4	If possible under federal rules, provide incentive to electronic filers by allowing later submittal time than hard-copy filers	3/30/2006	Purcell (Choi, Linker)	Incentive of later due date will only be given to facilities using eDMR who are also E3 or E4 facilities under VEEP	complete
3	Allow DMR reporting on exception-only basis	1	Investigate regulatory barriers to "exception only" reporting and explore reporting requirements and the advisability of making these changes with EPA	4/30/2006	Purcell, Choi	Draft letter for Ellen to send EPA regarding possibility of exception only reporting	on track
		2	Determine uses of DMR data that does not only involve exceedences of permitted limits	5/1/2006	Purcell (Choi, Ziomek)	Develop list of uses of DMR data that would not be accomplished if had exceptions only reporting	on track
		3	Determine effects on compliance reporting and integrity of CEDs database as well as any changes that may be needed to accommodate such reporting	5/1/2006	Purcell (Choi, S.Tragesser)		on track
		4	Determine if regulatory changes is needed in state regulation to accommodate reporting flexibility should EPA approve such a change	10/1/2006	Purcell, Linker	Should 1-3 be favorable, then examine legal ability to accommodate	pending results of other tasks
		5	If possible and if it will not inhibit the agency's ability to obtain needed information, implement changes	10/1/2007	Purcell		pending results of other tasks

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4	Strengthen regulatory and guidance development/deployment	1	See Cross-Program Opportunity 1			Being addressed in another section	
5	Make inspections more valuable to DEQ and permit holder		See Cross Program Opportunity 3				
		1	Evaluate and implement risk-based inspection program	9/1/2006	Purcell(Regional Compliance Managers, Inspection Coordinator)	Received EPA approval for concept; will develop first for majors; need to incorporate E3/E4 facilities	on track
		2	Coordinate with DCLS to define and eliminate overlaps and redundancies related to laboratory inspections and the use of split sample inspections	10/1/2006	Purcell, Ziomek	Progress on this task is related to apparent delay in regulation allowing DCLS to take over responsibility for lab inspection program	pending DCLS action
		3	Work towards appropriate balance between announced and unannounced inspections. Develop MOU with EPA (and investigate the need to modify VA statutes) that deal with inspection schedules and appropriate pre-inspection notification	9/1/2006	Purcell(Rick Linker, Regional Compliance Managers, Inspection Coordinator)	Talk to EPA about MOU on inspections; check statutory authority; draft criteria on inspection notifications	on track
		4	Provide opportunities for inspection schedule flexibility for VEEP or PT facilities	10/1/2006	Golden (Sizemore, Purcell, Baxter)	Develop criteria for flexible inspection schedule in VEEP; communicate to staff and facilities	on track
		5	Develop workforce retention plan and training for DEQ inspectors.	6/1/2006	Hawkins/Mongold	Being addressed in Career Path Phase I	on track
6	Expand compliance assistance support	1	Conduct DEQ seminars for smaller facilities	7/1/2006	Vanderland (Staples, Purcell)	Already conducting training and seminars at small STPs; look at expanding program and topics Provide schedule and outline of seminar	on track
		2	Identify mentoring mechanisms and develop program to provide mentors and technical assistance to smaller facilities.	10/1/2006	Vanderland (Staples, Purcell)	Evaluate whether current efforts are sufficient or need to expand tech assistance; consider linking experienced facilities with new facilities or operators for mentoring program	on track
		3	Identify common sources/types of quality problems and identify fixes (ie, training, peer reviews)	7/1/2006	Vanderland (Staples, Purcell)	Evaluate whether current efforts are sufficient or need to expand tech assistance; consider linking experienced facilities with new facilities or operators for mentoring program	on track
		4	Define clear criteria regarding what kind and amount of compliance assistance DEQ staff should provide to the regulated community, including training seminars	10/1/2006	Vanderland (Sizemore, Purcell)		on track
		5	Investigate feasibility of using electronic inspection forms to improve efficiency and quality of inspections	10/1/2006	Purcell (Inspection Coordinator)	Do cost/benefit analysis of use of handheld computers in field and feasibility of direct links to CEDS	on track
		6	Identify target areas to improve compliance assistance. Prepare better tools for DEQ staff, including permit manuals and guidance	12/1/2006	Purcell (Inspection Coordinator)	Evaluate where improvements to compliance assistance can achieve most benefit; ensure that DEQ staff are knowledgeable of compliance assistance tools via guidance and updates to permit manual	on track

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7	Streamline sewage overflow notification requirements	1	Investigate what other states are doing (thresholds for reportable quantities notification timeline, reporting method). As part of establishing reportable quantity thresholds, ensure compatible with emerging USEPA reporting requirements.	3/1/2006	O'Connell, Purcell	Done, neither other states nor EPA allow for exemptions from reporting requirements for overflows	complete
		2	Investigate web-based reporting requirements and reduce duplicative notifications (esp., HRPDC model)	11/1/2006	Purcell(Choi, LaFleur)	look at existing reporting tools, such as HRPDC model; do cost/benefit analysis and feasibility of hosting on DEQ web	on track
		3	Clarify whether VPDES permit standard conditions can be modified to include a specific reportable quantity.	3/1/2006	O'Connell, Purcell	Modification to DEQ's current reporting requirements is not recommended as EPA program policy does not allow for exemptions to reporting requirements for sewage overflows. Current requirements for reporting all discharges are in statute and follow CWA requirements.	complete
8	Improve decision-making for collection of data on toxic pollutant discharge and sampling requirements	1	Identify key communication opportunities for DEQ to explain when additional sampling will be required in developing permit specific effluent limits	6/1/2006	Winter (DeBiasi)	Review permit manual to ensure adequate explanations; consider use of website to describe sampling requirements, speak at conferences	on track
		2	Provide training to DEQ staff, permittees and other stakeholders on the statistical methods used in developing permit requirements and how it relates to monitoring	9/1/2006	Winter (DeBiasi, Brockenbrough)	develop list of statistical methods used and training needs; develop guidance or schedule training session to go over methods and their use	on track
		3	Review DEQ's approach to effluent sampling requirements for toxics (what, when, how often)	6/30/2006	Winter (DeBiasi)	Look at DEQ's approach as it relates to EPA requirements; do feasibility analysis given existing staffing versus requirements	on track
9	Streamline individual permit application and renewal process		See Cross Program Opportunity 2				
		1	Develop staff guidance and encourage use of more formal pre-application meetings when requested by permit applicant. Include checklist of items to be discussed.	9/1/2006	Winter(Brockenbrough, Fowler, Newman)	Develop best practice document on upfront coordination for permit applicants on new applications and renewals	on track
		2	Explore "dampening" 5-year peak permit renewal load by utilizing administrative continuance powers and negotiating with EPA for longer permit terms	5/30/2006	Winter(Brockenbrough, Fowler, Newman)	Kyle write letter for Ellen to send to EPA for their opinion on longer terms	on track
		3	Simplified "ditto" format for permit renewals where nothing has changed, use data already on-file with DEQ and use of "table of changes" to streamline applications.	9/30/2006	Winter(Brockenbrough, Fowler, Newman)	Analyze feasibility of simplifying renewals when no information has changed, given EPA requirements	on track
		4	Streamline review process and reduce duplicative reviews by managers and peer review	9/30/2006	Winter(Fowler, Newman)	Develop best practice document on use of peer reviews versus manager review to reduce time spent and improve efficiency	on track
		5	Establish faster track through permit process for VEEP and PT facilities.	7/30/2006	Winter, Baxter	Look at appropriate incentives for VEEP facilities; develop guidance for staff	on track

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10	Expand use of General Permits and streamline the application process		See Cross Program Opportunity 2			Doing survey for best use of e-registration for GP types	
		1	Explore further exemptions from APA for adoption of General permits	9/1/2006	Fowler (Faha, Winter)	Develop recommendations for changes and benefits achieved (see task 2 below)	on track
		2	Explore feasibility of staggering 5-year permit term within an individual GP (or between GPs)	9/1/2007	Fowler (Faha, Winter)	Survey other states to see if they have GP program that allows for coverage for full 5 year period from site-specific approval date rather than regulation effective date; Conact EPA to determine if any regulation changes needed to implement full 5 year coverage from date of approval of site-specific GP; Either implement via guidance or initiate regulation change	on track
		3	Discuss with EPA whether the term "requires a permit" under CWA applies to every point source discharge (ie, permit exemptions)	5/1/2006	Winter(Fowler)	Kyle write letter for Ellen to send to EPA for their opinion	on track
		4	Benchmark how General Permits are used in other states	5/1/2006	Winter(Gregory)	Conduct survey of other states using ASIWPCA and ECOS to help; summarize good suggestions	on track
		5	Expand categories of general permits (drinking water treatment plant discharges, package plants, etc)	7/30/2006	Fowler (Faha, Winter)	Workgroup established to look at what other permit categories would benefit from GP to increase efficiency	on track
		6	Expand use of watershed based general permits	12/30/2006	Winter	First watershed GP Draft going to March 2006 Board Meeting for approval for public comment	on track